

July 3, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: SES and Intelsat Notice of *Ex Parte* Presentation
GN Docket Nos. 17-183, 18-122**

Dear Ms. Dortch:

On June 29, 2018, representatives of SES and Intelsat (the “Parties”) met with Nicholas Degani, Senior Counsel, and Rachael Bender, wireless and international legal advisor, to Chairman Ajit Pai. Participants in the meeting on behalf of SES were Petra Vorwig, SES Senior Legal & Regulatory Counsel, and the undersigned, outside counsel to SES; for Intelsat, Susan Crandall, Associate General Counsel, and Gregg Elias, Wiley Rein LLP, outside counsel to Intelsat.

In this meeting, the Parties discussed the draft *Order and NPRM*¹ on Expanding Flexible Use of the 3.7 to 4.2 GHz band (“C-band”) tentatively scheduled to be voted on at the July 12th Open Commission Meeting. The Parties discussed why the information collection requirements in the draft C-band *Order* are premature, as decisions made in the *NPRM* could result in significant changes in the information to be collected (and may make collection of the information unnecessary). The Parties also stated that some of the information collection requirements are irrelevant or unanswerable for transportable and steerable antennas. Before placing an extraordinary burden on C-band receive-only earth station operators, especially small and rural operators, the Commission should weigh the costs and benefits of doing so and seek comment. At a minimum, the Commission should include in the *Order* specific questions appropriate to transportable and steerable antennas, as proposed in Appendix A.

In addition, the Parties noted that, although they appreciate the Commission staff’s willingness to work with them on reducing obstacles to registering operational earth stations, they are seeking further streamlining because of concerns that the current registration process still imposes undue economic and administrative burdens on small businesses. The Parties reiterated that more than 100 million U.S. households rely on the C-band for their video programming services and that alternative satellite bands do not offer the same high reliability provided by the C-band. Therefore, additional steps to remove obstacles to registering earth stations should be taken by the Commission to ensure that it has a complete picture of the current earth station landscape in the C-band.

¹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band, Order and Notice of Proposed Rulemaking*, GN Docket No. 18-122, GN Docket No. 17-183 (draft released June 21, 2018) (“*Order*” or “*NPRM*”).

July 3, 2018

This notice is filed pursuant to FCC Rule 1.1206; please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Michele C. Farquhar

Michele C. Farquhar
Partner

Counsel to SES
michele.farquhar@hoganlovells.com
D 202 637 5663

cc: Nicholas Degani
Rachael Bender

APPENDIX A
Proposed Questions for the Order

Transportable Antennas

What is the address of the antenna's home base – i.e., where is it located when not in service?

How many miles from that home base might this antenna be relocated in order to provide C-band satellite services for an event?

How many days per month, on average, is the antenna in use?

How much notice might you have before utilizing this antenna to provide C-band distribution services for an event?

What is the average number of consecutive days that the antenna is in use for any event?

When in use to uplink, is the antenna also being used to downlink?

When in use, approximately how much bandwidth, on average, is utilized for the downlink?

From how many transponders on the same satellite might the antenna receive content at any given time?

How many SCPC or MCPC channels/paths might the antenna be receiving in the downlink from one transponder at any time?

Besides downlinking your own transmission, is the antenna also utilized to downlink other services at the same time? If so, what is the nature of those additional downlink services?

Steerable Antennas

How often is the steerable antenna repointed during a day, week, month or year?

Is the pointing schedule predictable? If so, to which orbital locations does the antenna point and for how long does it remain pointed at that orbital location? Does the steerable antenna operator know which satellite transponder is providing the signal?

How much bandwidth does the antenna use each time it is repointed?

Are there periods of time during which the steerable antenna is not in use?

For what reasons might the steerable antenna be repointed?

What content is received through the steerable antenna?